

**EXHIBIT A****Parties' Proposed Agreed Upon Schedule for Motion to Dismiss<sup>1</sup>**

<b>Event</b>	<b>Date</b>
Motion and supporting documents	10/15/18
Opposition	11/16/18
Reply	12/5/18

**Plaintiff's Proposed Case Schedule**

<b>Event</b>	<b>Plaintiff's Proposal</b>
MIDP/Rule 26(a)(1) disclosures (Dkt. No. 19)	11/15/18
Deadline for filing proposed Protective Order and ESI Order	11/26/18
Production of ESI identified in MIDP disclosures (triggered by MIDP disclosures deadline)	12/26/18
Deadline to amend the pleadings and bring in other parties	7/12/19
Deadline for completing fact discovery	1/10/20
Expert reports of parties with burden of proof	2/7/20

Rebuttal expert reports	2/28/20
Deadline for completing expert discovery	3/25/20
Deadline for filing dispositive motions	4/24/20

**Defendants' Proposed Case Schedule**

<b>Event</b>	<b>Defendants' Proposal</b>
Deadline for filing proposed Protective Order and ESI Order	11/26/18
Initial MIDP/Rule 26(a)(1) disclosures pursuant to Defendants' proposal	1/18/19

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<sup>1</sup> Defendants request oral argument regarding their forthcoming Motion to Dismiss. Plaintiff does not oppose oral argument should the Court deem it necessary.

Complete full MIDP disclosures due pursuant to Defendants' proposal	2/22/19
Production of ESI identified in MIDP disclosures (triggered by MIDP disclosures deadline)	3/25/19
Deadline to amend the pleadings and bring in other parties	7/12/19
Deadline for completing fact discovery	1/10/20
Expert reports of parties with burden of proof	2/7/20
Rebuttal expert reports	2/28/20
Deadline for completing expert discovery	3/25/20
Deadline for filing dispositive motions	4/24/20